

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

LEON WEINGRAD, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

TOP HEALTHCARE OPTIONS  
INSURANCE AGENCY INC.

f/k/a “NATIONAL HEALTH  
ENROLMENT CENTRE”

Defendant.

---

Case No.

**2:23-CV-05114**

**CLASS ACTION  
JURY TRIAL DEMANDED**

**PLAINTIFF’S MOTION TO ADMIT ANTHONY I. PARONICH  
*PRO HAC VICE***

Comes now Plaintiff, Leon Weingrad, by and through his existing counsel, Andrew Roman Perrong, and moves for admission of Anthony I. Paronich in this case *pro hac vice*.

In accordance with Judge Kearney’s *Policies and Procedures* regarding *pro hac vice* admissions, current counsel for the Plaintiff, Andrew Roman Perrong, avers as follows:

1. I am admitted to practice before and am in good standing before this Court.
2. I have entered my appearance in this case and confirm my continuing obligations under Section I.K of Judge Kearney’s Policies.

3. Mr. Weingrad requires Mr. Paronich’s special admission for multiple reasons. This is a complex nationwide class action alleging violations of the federal Telephone Consumer Protection Act. Being that Mr. Perrong is a solo practitioner with only a year of practice

experience and limited resources, Mr. Paronich brings additional resources to assist in the prosecution of this class action from over a decade of TCPA class action experience. It should be noted that Mr. Paronich has been deemed adequate class counsel in and had over one hundred class actions certified in his career, including a record-setting TCPA jury verdict against Dish Network which was upheld by the Supreme Court.

4. Counsel for the Defendant has consented to the admission of Mr. Paronich *pro hac vice*.

September 9, 2024

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
a@perronglaw.com

**CERTIFICATE OF SERVICE**

I certify that I filed the foregoing via ECF on the below date, which will send notification to all counsel of record.

Dated: September 9, 2024

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
a@perronglaw.com